

Vinson&Elkins

Mike Dry mdry@velaw.com
Tel +1.202.639.6525 Fax +1.202.879.8865

May 16, 2022

By ECF

The Honorable Richard M. Berman
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

P✓

| |
|----------------------|
| USDC SDNY |
| DOCUMENT |
| ELECTRONICALLY FILED |
| DOC #: |
| DATE FILED: 5/17/22 |

Re: United States v. Joachim Alexander von der Goltz, 18 Cr. 693 (RMB)

Dear Judge Berman:

We respectfully submit this request on behalf of our client Joachim Alexander von der Goltz for early termination of his supervised release. Early termination of Mr. von der Goltz's term of supervised release is warranted based upon the factors of 18 U.S.C. § 3583(e)(1), the U.S. Probation Office for the Southern District of New York's Early Termination from Supervision policy favoring early termination where warranted, and the record in this matter.

On December 6, 2019, Mr. von der Goltz pleaded guilty to three counts of a Superseding Information, and was sentenced by this Court on March 4, 2021 to time served and three years of supervised release on counts one and three to run concurrently with one year of supervised release on count two. The Court may terminate supervised release "at any time after the expiration of one year of supervised release . . . if it is satisfied that such action is warranted by the conduct of the defendant released and the interest of justice." 18 U.S.C. § 3583(e)(1).

Mr. von der Goltz has steadfastly complied with supervised release in the Southern District of Florida where he resides, including, but not limited to, his successful completion of therapeutic counseling, his steady employment, and stable residence both well before and during his term of supervised release. Indeed, on May 9, 2022, Probation Officer John Steinhilber described for the Court that he does not think Mr. von der Goltz's supervised release "could be going much better" than it has. In his opinion, Mr. von der Goltz has been doing "great" and things have been "going really well" for Mr. von der Goltz during his supervision. Tr. 3:4–5, May 9, 2022. Probation Officer Steinhilber further described that Mr. von der Goltz continues to work full-time and reside with his family, and further, is "very stable," "turns in all of his monthly paperwork," is "very compliant and asks questions when he needs to," and has had "wonderful conversations" with Probation Officer Steinhilber during the term of his supervised release. Based on Mr. von der Goltz's successful supervision to date, Officer Steinhilber

V&E

The Honorable Richard M. Berman Page 2

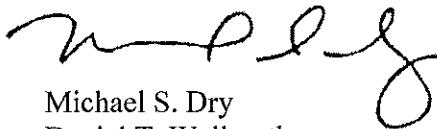
supports early termination of Mr. von der Goltz's supervised release. Undersigned counsel also shared this letter with Officer Steinhilber, and he agreed with the contents and representations therein.

Further, during the status hearing on May 9, 2022, the Government recognized Mr. von der Goltz's exemplary efforts both before and during his supervised release and, accordingly, does not object to the early termination of his supervised release. Tr. 6:4-9.

* * *

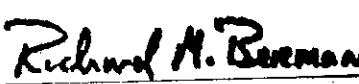
As the undersigned expressed at the May 9, 2022 hearing, Mr. von der Goltz very much appreciates how the Court has overseen his supervision and believes that the Court's interest in his progress has meaningfully contributed to his successful supervision. For the foregoing reasons, Mr. von der Goltz respectfully requests that the Court enter an order finding that an early termination of his supervised release is warranted under 18 U.S.C. § 3583(e)(1).

Respectfully submitted,



Michael S. Dry
Daniel T. Wallmuth

CC: Thane Rehn, Assistant U.S. Attorney
John Steinhilber, Probation Officer

| | |
|---|--|
| <p>Application Granted, on consent. Best of luck.</p> | |
| <p>SO ORDERED: Date: <u>5/17/22</u>  Richard M. Berman, U.S.D.J.</p> | |